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October 27, 2022

VIA ECF

The Honorable Alvin K. Hellerstein
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Harpo, Inc. v. Jackson et al., No. 22-cv-06787 (S.D.N.Y.)

Dear Judge Hellerstein:

We represent Plaintiff Harpo, Inc. (“Harpo”) in the above-referenced matter. We write to advise the Court of the status of this case, and to respectfully request relief under Federal Rule of Civil Procedure 4(m) and ask that the Court extend the time to serve the Complaint.

The Complaint has not yet been served on Defendants, as the parties have been in active communication in good-faith efforts to resolve this dispute rather than litigate it. Those efforts have been productive, and it is the parties’ expectation that a resolution can be finalized in the coming weeks.

In light of the advancements that have been made toward fully resolving this dispute without further need of the Court’s involvement, Harpo respectfully submits that good cause exists for a 30-day extension of the deadline to serve the Complaint prescribed by Rule 4(m) of the Federal Rules of Civil Procedure. *See, e.g., Park Plus, Inc. v. Ardeon Realty Corp.*, 2014 WL 338543, at *1-3 (S.D.N.Y. Jan. 28, 2014) (granting 30-day extension for service of pleading under Rule 4(m) based on parties’ settlement negotiations, noting that “[s]ettlement negotiations can, in the proper circumstances, satisfy Rule 4(m)’s ‘good cause’ requirement”) (quotations omitted). Service of the Complaint is currently due on Monday, November 7, 2022. There have been no previous requests for extensions. Defendants consent to this motion.

Accordingly, we respectfully request that the time to effectuate service of the Complaint in this action be extended by thirty (30) days, to Wednesday, December 7, 2022.

Thank you for the Court’s consideration of this request, for which Harpo reserves all rights.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Tamara Carmichael', written in dark ink.

Tamara Carmichael

cc: Defendants’ counsel (by email)